## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE:	§	
	<b>§</b>	
CAMI KAY STEWART,	§	CASE NO. 14-42373
	§	(Chapter 7)
DEBTOR	§	

## TRUSTEE'S NOTICE OF INTENT TO ABANDON PROPERTY OF THE ESTATE (50 SHARES OF WOOD 'N' WOOD INCORPORATED STOCK)

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

## TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:

Christopher J. Moser, the Chapter 7 Trustee of the above-referenced bankruptcy estate (the "Trustee") files his Notice of Intent to Abandon Property of the Estate ("Notice") as follows:

- 1. On November 4, 2014, Cami K. Stewart ("Debtor") filed with this Court a voluntary petition under Chapter 7 of the Bankruptcy Code.
- 2. Christopher J. Moser was thereafter appointed interim trustee of the estate, subsequently qualified and is now the acting Chapter 7 Trustee of the Debtor's bankruptcy estate.
- 3. The bankruptcy estate owns 50 shares of stock in Wood "N" Wood Incorporated (the "Stock").
- 4. The Trustee's valuation expert has valued the Stock and advised the Trustee that the Stock has no value.

5. Pursuant to §554(a) of the Bankruptcy Code, a trustee may abandon any property of the estate that is burdensome to the estate or is of inconsequential value and benefit to the estate. In the opinion of the Trustee, the Stock is of no value to the bankruptcy estate. Therefore, the Trustee seeks authority to abandon the Stock.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests that this Court authorize the Trustee to abandon the Stock and that this Court grant the Trustee such other and further relief to which he may be justly entitled.

Respectfully submitted,

CHRISTOHPER J. MOSER, TRUSTEE 2001 Bryan Street, Suite 1800 Dallas, Texas 75201 (214) 871-2100 (Telephone) (214) 871-2111 (Telefax)

By: <u>/s/ Christopher J. Moser</u> Christopher J. Moser State Bar No. 14572500

**CHAPTER 7 TRUSTEE** 

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served via regular U.S. mail, postage prepaid, on this 19<sup>th</sup> day of February, 2015, upon all parties on the attached Matrix.

/s/ Christopher J. Moser